	Case 2:16-cv-01877-JLR Docum	ent 94	Filed 07/27/18	Page 1 of 4
4			HONORABL	E JAMES L. ROBART.
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7	IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON			
8	AT SEATTLE			
9	SUSAN CHEN, et. al.,	CIV	TL ACTION NO	. 16-cv-01877-JLR
10	Plaintiffs,			
11	vs.			TION AND ORDER
12	NATALIE D'AMICO, et al.,	FOR LEAVE TO FILE FOURTH AMENDED COMPLAINT		
13	Defendants.			
14			•	
15	Pursuant to F.R.C.P. 15(a)(2) and LCR 15, Plaintiffs, by and through their counsel of			
16	record, hereby respectfully submit this Stipulated Motion for Leave to File Fourth Amended			
17	Complaint. All opposing parties, by and through their counsel of record, have provided their			
18	written consent to the filing of the proposed Fourth Amended Complaint and hereby stipulate to			
19	its filing, without waiver of all arguments available to them as to the claims and allegations asserted			
20	therein.			
21	Pursuant to LCR 15, the proposed amended pleading is attached as Exhibit A hereto and			
22	a redline indicating how the proposed amended pleading differs from the operative complaint (the			
23	Third Amended Complaint, Dkt. #91) is attached as Exhibit B hereto.			
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27	. ///			
	STIPULATED MOTION FOR LEAVE TO FILE AMENDED COMPLAINT - 1 - 16-cv-01877-JLR		701 FIFTH AVB SEATTLE, W	VHITNEY LLP NUE, SUITE 6100 A 98104-7043)6) 903-8800 903-8820

1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD. 2 DATED: July 27, 2018. 3 DORSEY & WHITNEY LLP OGDEN MURPHY WALLACE, PLLC 4 5 /s/ Shawn Larsen-Bright /s/ Aaron P. Riensche, per email auth. Shawn Larsen-Bright, WSBA # 37066 Aaron P. Riensche, WSBA No. 37202 6 Nathan Alexander, WSBA #37040 Geoff J. M. Bridgman, WSBA No. 25242 T. Augustine Lo, WSBA # 48060 Daniel F. Shickich, WSBA No. 46479 7 701 Fifth Avenue, Suite 6100 901 5th Ave., Ste. 3500 Seattle, WA 98164-2008 Seattle, WA 98104 8 Tel. 206-903-8800 Tel. 206-447-7000 9 E: larsen.bright.shawn@dorsey.com E: ariensche@omwlaw.com E: gbridgman@omwlaw.com E: alexander.nathan@dorsey.com 10 E: lo.augustine@dorsey.com E: dshickich@omwlaw.com Court-Appointed Attorneys for Plaintiff Susan Counsel for Defendants City of Redmond, 11 Chen, individually, and as FRCP 17 Guardian Natalie D'Amico, Redmond Police Ad Litem for Plaintiff JL Department, Ron Gibson, and Kristi Wilson 12 13 MYERS & COMPANY, PLLC ASSISTANT ATTORNEY GENERAL 14 /s/ Scott M. Barbara, per email auth. /s/ Michael David Myers, per email auth. 15 Michael David Myers, WSBA No. 22486 Scott M. Barbara, WSBA No. 20885 Torts Division, Seattle 1530 Eastlake Avenue East 16 800 5th Ave., Ste. 2000 Seattle, Washington 98102 17 Tel. (206) 398-1188 Seattle, WA 98104 Tel. (206) 389-2033 E: mmyers@myers-company.com 18 Attorneys for Plaintiff Naixiang Lian, E: scottb2@atg.wa.gov Counsel for DSHS, Kimberly Danner, individually, and as FRCP 17 Guardian Ad 19 Litem for Plaintiff LL Timothy Earwood, Jill Kegel, Bill Moss, Kevin Quigley, and Tom Soule 20 21 22 23 24 25 26 27

STIPULATED MOTION FOR LEAVE TO FILE AMENDED COMPLAINT 16-cv-01877-JLR DORSEY & WHITNEY LLP 701 FIFTH AVENUE, SUITE 6100 SEATILE, WA 98104-7043 PHONE: (206) 903-8800 FAX: (206) 903-8820

PURSUANT TO STIPULATION, IT IS SO ORDERED. (DK+. # 94-1)

Plaintiffs must file and serve the amended pleading on all parties within fourteen (14) days

of the filing of this Order.

DATED: JWY

THE HONORABLE JAMES L. ROBART UNITED STATES DISTRICT COURT JUDGE

STIPULATED MOTION FOR LEAVE TO FILE AMENDED COMPLAINT 16-cv-01877-JLR

- 3 -

DORSEY & WHITNEY LLP

701 FIFTH AVENUE, SUITE 6100 SEATTLE, WA 98104-7043 PHONE: (206) 903-8800 FAX: (206) 903-8820

1 CERTIFICATE OF SERVICE I hereby certify that on this date I caused to be served the foregoing on the following counsel of record by the method indicated: 3 Aaron P. Riensche, WSBA No. 37202 Via Messenger Geoff J. M. Bridgman, WSBA No. 25242 Via Facsimile Daniel F. Shickich, WSBA No. 46479 Via U.S. Mail 5 OGDEN MURPHY WALLACE, PLLC Via Electronic Mail 901 5th Ave., Ste. 3500 Via ECF Notification 6 Seattle, WA 98164-2008 T: 206-447-7000 7 F: 206-447-0215 8 E: ariensche@omwlaw.com E: gbridgman@omwlaw.com 9 E: dshickich@omwlaw.com Counsel for Defendants City of Redmond, 10 Natalie D'Amico, Redmond Police Department, Ron Gibson, and Kristi Wilson 11 Michael David Myers, WSBA No. 22486 Via Messenger 12 MYERS & COMPANY, PLLC Via Facsimile 1530 Eastlake Avenue East Via U.S. Mail 13 Seattle, Washington 98102 Via Electronic Mail Tel. (206) 398-1188 ∀ Via ECF Notification 14 E: mmyers@myers-company.com Attorneys for Plaintiff Naixiang Lian, 15 individually, and as FRCP 17 Guardian Ad 16 Litem for LL Scott M. Barbara, WSBA No. 20885 Via Messenger 17 ASSISTANT ATTORNEY GENERAL Via Facsimile Torts Division, Seattle Via U.S. Mail 18 800 5th Ave., Ste. 2000 Via Electronic Mail Seattle, WA 98104 Via ECF Notification 19 Phone: (206) 389-2033 / 206-464-7352 20 Fax: (206) 587-4229 E: scottb2@atg.wa.gov 21 Counsel for DSHS, Kimberly Danner, Timothy Earwood, Jill Kegel, Bill Moss, 22 Kevin Quigley, and Tom Soule 23 Dated this 27th day of July, 2018. 24 25 /s/ Molly Price Molly Price 26 27 STIPULATED MOTION FOR LEAVE DORSEY & WHITNEY LLP 701 FIFTH AVENUE, SUITE 6100 TO FILE AMENDED COMPLAINT SBATTLE, WA 98104-7043 PHONE: (206) 903-8800

FAX: (206) 903-8820

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